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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AZIZA EXOM, an individual,

Plaintiff,

vs.

BROCK & SCOTT, PLLC, a foreign
professional limited-liability company,

Defendant.

Case No: 2:24-cv-00773-APG-EJY

**STIPULATION AND ORDER TO
PERMIT SUPPLEMENTAL
BRIEFING
(FIRST REQUEST)**

The parties hereby stipulate and agree to permit both parties to file supplemental briefing regarding Defendant's pending Motion to Dismiss. This stipulation is supported by good cause explained below and permitted by FRCP 15, LR IA 6-1, LR 7-2, and LR 26-3.

I. Introduction

This case commenced on April 23, 2024, with Plaintiff's Complaint. ECF 1. Defendant filed a Motion to Dismiss on June 28, 2024. ECF 8. Plaintiff filed her opposition on August 2, 2024. ECF 11. Defendant filed a Reply in Support of its Motion to Dismiss on August 8, 2024. ECF 12. The Motion to Dismiss is still pending as of today before Judge Andrew Gordon.

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On October 2, 2024, this Court issued an Order that permitted Plaintiff to conduct limited jurisdictional discovery in the form of five interrogatories and five requests for production of documents. ECF 17. Plaintiff propounded, and Defendant responded to, this written discovery as set permitted by this Court. After receipt of Defendant's responses, Plaintiff filed a Motion for Leave to File a Supplemental Memorandum regarding her opposition to Defendant's Motion to Dismiss on November 19, 2024. ECF 21.

II. Good Cause Exists to Support this Stipulation.

Both Plaintiff and Defendant wish to file supplemental memoranda as to whether the Court has personal jurisdiction over Defendant. Permitting one another to file supplemental memorandum will preclude any dispute over motions for leave to supplement, limiting the need for this Court to rule on such motions, preserving the Court's time and resources.

For this reason, the parties have agreed that Plaintiff's Motion for Leave to File a Supplemental Memorandum should be granted. Further, the parties have agreed that Defendant shall be permitted to file a Supplemental Memorandum in Support of its Motion to Dismiss concerning personal jurisdiction only. Defendant's Memorandum shall be submitted to this Court by 5:00 PM on December 6, 2024.

III. Conclusion

Based on the foregoing, the parties respectfully request that this Court issue an Order (i) granting Plaintiff's Motion for Leave to File a Supplemental Memorandum in Support of Response to Defendant's Motion to Dismiss and (ii) permitting Defendant to file a Supplemental Memorandum in Support of its Motion to Dismiss by 5:00 PM on December 6, 2024.

/// IT IS SO ORDERED.

/// Dated: December 3, 2024

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 ANDREW P. GORDON
 CHIEF UNITED STATES DISTRICT JUDGE

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1 IT IS SO STIPULATED.

2 Dated this 2nd day of December, 2024.

3 LAW OFFICE OF KEVIN HERNANDEZ

LIPSON NEILSON P.C.

4 /s/ Kevin L. Hernandez

Joseph P. Garin

5 _____
6 Kevin L. Hernandez, Esq.
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9900 Covington Cross Dr., Ste. 120
Las Vegas, NV 89144
Attorneys for Defendant

11 **ORDER**

12 IT IS SO ORDERED.

13 _____
14 U.S. DISTRICT JUDGE

15 Dated: _____
16

17
18 Submitted by:

19 LIPSON NEILSON P.C.

20 *Joseph P. Garin*

21 _____
22 Joseph P. Garin, Esq.
23 NV Bar No. 6653
24 *Attorneys for Defendant*